UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

April 9, 2001

Mr. Greg Strong
Macdermid Inc.
526 Huntingdon Avenue
Waterbury, CT 06708

Re: RCRA Corrective Action Environmental Indicators at Macdermid Incorporated, 526 Huntingdon Avenue, Waterbury, CT (CTD001164599)

Dear Mr. Strong,

Thank you for preparing and submitting the RCRA Corrective Action Stabilization Report, dated March 16, 2001 and thank you and the other MacDermid representatives for taking the time to meet again on April 4.

The EPA has completed a review of the Stabilization Report and a summary of any comments and questions is contained in Attachment 1.

Please feel free to contact me at (617) 918-1368 if you have any questions.

Sincerely,

Carolyn J. Casey
RCRA Facility Manager

cc: M. Crawford, CTDEP
R. McFee, HRP
M. Tillona, MacDermid
J. Wellington, Carmody & Torrance

ATTACHMENT 1

General Comments

Please show MacDermid's property line on an appropriately scaled map. Include all property on the north side of Huntingdon Avenue.

Please verify if the two rusted 55-gallon drums located north of AOC-A are on MacDermid's property. Even if they are not, a release from this disposal area, hydraulically upgradient of MacDermid property, could be impacting groundwater at AOC-A and some follow-up may be necessary.

There was obvious trespassing in the area of AOC-A based on the remnants of the bonfire, broken bottles and plastic cups in the area. MacDermid should consider available options for securing this property in consideration of potential trespasser exposure and general liability.

Generally, if it is unknown if surface water poses a risk to recreators, it would also be unknown if sediment poses a risk, unless there was data to support that no risk exists.

Please provide copies of available aerial photographs.

For UST areas where fuel oils were/are stored, total petroleum hydrocarbons and polyaromatic hydrocarbons should be included in the analysis. If not previously included, the lack of this analysis should be listed as a data gap so that this analysis will be included in future sampling.

Any tentatively identified compounds (TICs) should be noted and discussed.

In the tables showing Contaminated Media, in the rationale column for each AOC where the CTDEP RSR volatilization criteria is mentioned, please be more specific as to which criteria was used for comparison (i.e., residential and/or industrial).

A data gap should be identified for each AOC Contaminated Media table where the "unknown" column is checked unless it is clear that no pathway exists (e.g., For AOC G *Groundwater Control*, there is a SWPC exceedance for zinc but the lack of any surface water data is not listed as a data gap).

Text summaries of contamination detected for each AOC should also include visual and olfactory observations and elevated PID readings (e.g., Boring log for GZ-3 notes CINDERS/ASH (FILL) from .5-2.5 foot depth; boring logs for GZ-8 and GZ-9 note spoils had a sweet odor; and boring log for GZ-8 also notes sample S-8 was copper colored).

Specific Comments

Section 1.2, page 2
Please revise this paragraph to more accurately reflect that the Gear Street building was used for the manufacturing of inks but that this operation rarely or no-longer takes place at the facility.

Section 2.1, page 7
Please clarify if AOC-A was used prior to 1978/1979 time frame when it was reportedly used by MacDermid. If so, also include information about who used the AOC and for what reasons (i.e., Was this area used by Waterbury Steel Ball Company?).

page 9
The information regarding surface water results contained in the fourth row and column of this table conflicts with that presented in Table 3. Please correct the tables as appropriate.

page 11
The lateral extent of the cover for this area should also be identified as a data gap as noted on page 10 under the rationale for surficial soil.

Section 2.5, page 29
The last statement in the second paragraph is misleading. Only one soil sample was analyzed for PCBs and the detection limits were elevated.

Please provide a copy of the gas chromotographic trace, and a copy of the reference chromatogram for the analysis of the light non-aqueous phase petroleum product.

Section 2.7, page 38
The rational for surface soil contained in this table mentions 0.013 ug/kg of PCE at TP-5. Please verify this information, table 10 shows mg/kg as the units.

The rationale for surface soil discusses SWPC but should likely be referencing the GB PMC instead.

Section 2.9, page 43
The last bullet states that DEP approval was requested prior to backfilling the excavation. Please provide a copy of the approval letter.

Tables
The more conservative hexavalent chromium standard should be used instead of the trivalent standard if speciation data is not available.

In Table1, for AOC L, please revise "transfer" to read "transformer."

This table provides data for samples collected in April 1986. Please provide copies of these laboratory reports.

The data contained in this table for MW-101 for sampling conducted 3/95 does not agree with the laboratory reports for MAC-6 contained in Appendix E pages 34-36 and 41. Please revise the summary tables as appropriate.

The data contained in Table 9 for at least MW-108 and MW-109 do not agree with the laboratory reports contained in Appendix F. In addition, vinyl chloride, chloroethane, and p-isopropyltoluene are not reported in the summary tables as being detected. Please revise the summary tables as appropriate.

Appendix E and F
The well designations in the 1995 Groundwater Data Summary for VOCs, Cyanide and Fluoride do not agree with the designations in the 1995 Groundwater Data Summary for Metals or the 2001 Groundwater Index. Please correct these tables as appropriate and verify that all tables are cross checked throughout the report and against the maps. Submit copies of the older maps showing well locations and previously used well designations.

Please provide copies of the chain of custody forms for all sampling events.

Appendix G
February 2001 WELL RECEPTOR SURVEY
There is no page 3, please verify if there is a page missing or if the pages were numbered incorrectly.

Section 4.0, page 7
It is necessary to know the status of the five water supply wells identified in the 1974 State of Connecticut Water Resource Bulletin No. 19. If these wells are still in use, the uses should be known to evaluate potential exposure routes and potential human health impacts. In addition, the pumping rate and frequency of water withdrawal should be known to evaluate any potential effects on groundwater and contaminant migration.

Figure 2
There are several lots where no information is provided, not even a lot number. Please clarify if these lots are vacant and if this was confirmed by a visual inspection.